

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)

Corr Wireless Communications, LLC)

Petition for Designation as an Eligible
Telecommunications Carrier)

CC Docket No. 96-45

RECEIVED

MAY 13 2003

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**PETITION FOR DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER**

Tom Buchanan, General Counsel
Corr Wireless Communications, LLC
600 3rd Avenue East
Oreonta, Alabama 35121
Phone: (205) 237-3000

Dated: May 13, 2003

No. of Copies rec'd 074
List A B C D E

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

MAY 13 2003

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

CC Docket No. 96-45

Corr Wireless Communications, LLC)

FCC 97-419

Petition for Designation as an)
Eligible Telecommunications)
Carrier)
_____)

**PETITION FOR DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER**

Corr Wireless Communications, LLC ("Corr Wireless" or "Company"), pursuant to Section 214(e)(6) of the Communications Act of 1934, as amended ("Act"), and the Commission's Public Notice implementing Section 214(e)(6),¹ hereby petitions the Common Carrier Bureau to designate Corr Wireless as eligible telecommunications carrier ("ETC") for the rural portion of its licensed service territory in the State of Alabama, excluding the rural wireline study areas that are not entirely encompassed in Corr Wireless' licensed service territory..²

The Alabama Public Service Commission ("APSC") lacks jurisdiction to consider Corr Wireless's request to be designated an ETC,³ and therefore the Federal Communications Commission ("FCC" or "Commission") clearly has jurisdiction under Section 214(e)(6) to

¹ *Procedures for FCC Designation of Eligible Telecommunications Carriers Pursuant to Section 214(e)(6) of the Communications Act*, Public Notice, FCC 97-419, 12 FCC Rcd. 22497 (1997).

² The designated area requested is included on the map attached as Exhibit 4. This area includes the rural portion of Corr Wireless' licensed service territory served by rural wireline carriers as shown in Exhibit 4. Please note that the requested area does not include any rural wireline study areas that are not entirely encompassed in Corr Wireless' licensed service territory.

³ See Exhibit 2, Order of the Alabama Public Service Commission ("APSC"), at page 3, where the APSC ruled that it did not have jurisdiction to grant ETC status to wireless carriers.

consider and grant this petition. As demonstrated below, Corr Wireless meets all the requirements for ETC designation to serve Alabama customers. Designating Corr Wireless as an ETC will serve the public interest.

I. CORR WIRELESS' UNIVERSAL SERVICE OFFERINGS

Corr Wireless provides cellular telecommunications and personal communications services (collectively referred to as "CMRS" or "wireless") in the service areas of Alabama pictured on the maps attached as Exhibit 3.⁴ As an FCC-licensed wireless service provider, Corr Wireless provides service in accordance with the terms of its FCC licenses, and is required to serve only in the areas where it is licensed by the Commission. The wireless service areas served by Corr Wireless in accordance with its FCC licenses are Alabama RSA 1, BTA108 (Decatur), BTA158 (Gadsden), BTA198 (Huntsville), and BTA017 (Anniston). A map depicting the Company's licensed service territory is included in Exhibit 4. Corr Wireless is either providing service, or intends to initiate service, in all of its licensed service territory as shown on the map in Exhibit 4.

Corr Wireless was granted ETC authority from the Commission for the non-rural portion of its licensed service territory served by BellSouth.⁵ With this Application, Corr Wireless seeks to be designated as an ETC for the rural portion of its licensed service territory served by rural wireline carriers as shown in Exhibit 4. Corr Wireless does not seek to redesignate any rural wireline study area. Importantly, Corr Wireless proposes to provide service as an ETC to the entire rural portion of its licensed service territory, and emphasizes that it is not "picking and choosing" a designated service area based upon the high or low cost of serving any particular

⁴ Please note that Map A in Exhibit 3 depicts Corr Wireless' current coverage area utilizing Time Division Multiple Access ("TDMA") technology, and Map B depicts Corr Wireless' current coverage area utilizing Code Division Multiple Access ("CDMA") technology.

portion of its service territory. Instead, Corr Wireless requests the specified ETC area based solely on its licensed service territory, and will provide designated ETC services to all requesting customers within its designated service area, throughout its designated area.

Moreover, Corr Wireless seeks ETC designation to expand its telecommunications offerings to consumers within the rural portion of its authorized wireless service territory. Corr Wireless either currently provides, or intends to provide, all of the services and functionalities supported by the federal universal service program, enumerated in Section 54.101(a) of the Commission's rules, throughout its licensed service territory in Alabama. Upon ETC designation, Corr Wireless will make available to consumers a universal service offering over its existing and expanded networks infrastructure and spectrum, including the same antenna, cell-site, tower, trunking, mobile switching, and interconnection facilities used by the Company to serve its non-ETC customers. Corr Wireless also will provide service to any requesting customer within the designated service area, and, if necessary, will deploy any additional facilities necessary to do so.

II. CORR WIRELESS SATISFIES ALL THE STATUTORY AND REGULATORY PREREQUISITES FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER

Corr Wireless satisfies each of the five elements set forth in the Commission's Section 214(e)(6) Procedure Public Notice, as shown below.

⁵ *Federal-State Joint Board on Universal Service; Corr Wireless Petition for Designation as an Eligible Telecommunications Carrier*, CC Docket No. 96-45, Memorandum Opinion and Order, DA 02-2855 (rel. Oct. 31, 2002). A copy of this Order is attached hereto as Exhibit B.

A. Corr Wireless is not Subject to the Jurisdiction of the Alabama Public Service Commission ("APSC")

Corr Wireless provides CMRS, and the Commission has previously recognized that a CMRS provider may seek designation as an ETC.⁶ Section 332(c)(3) of the Act precludes rate and entry regulation of CMRS providers by state public utility commissions.⁷ This Commission has jurisdiction, under Section 214(e)(6), to designate CMRS providers as ETCs.

The APSC, in an order attached to this Petition as Exhibit 2, has concluded that wireless carriers are not subject to state jurisdiction in Alabama and therefore must seek ETC designation from the FCC pursuant to Section 214(e)(6).

B. Corr Wireless Offers all of the Services Supported by the Federal High-Cost Universal Service Program

Corr Wireless satisfies the FCC's requirements that an ETC designated pursuant to Section 214(e)(6) "offer, or will be able to offer all of the services designated for support by the Commission."⁸ As described below, Corr Wireless currently offers, or intends to offer, each of the supported services described in Section 54.101(a) of the Commission's rules throughout its

⁶ See *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, First Report and Order, 12 FCC Rcd. 8776, 8858-59, ¶ 145 (1997) ("Universal Service First Report and Order"); *Federal-State Joint Board on Universal Service, Access Charge Reform*, Seventh Report and Order and Thirteenth Order on Reconsideration in CC Docket No. 96-45, Fourth Report and Order in CC Docket No. 96-262, and Further Notice of Proposed Rulemaking, FCC 99-119 at ¶ 72 (released May 28, 1999).

⁷ 47 U.S.C. § 332(c)(3). State implementation of Section 214(e) is arguably a form of entry regulation (particularly given the overall focus of Section 214 of the Act on authorizing carriers to extend facilities or to provide service). See also *Federal-State Joint Board on Universal Service: Promoting Deployment and Subscribership in Unserved and Underserved Areas, Including Tribal and Insular Areas*, CC Docket No. 96-45, Further Notice of Proposed Rulemaking, FCC 99-204, ¶¶ 78, 82 (released September 3, 1999) (suggesting that FCC may designate CMRS providers as ETCs under 47 U.S.C. 214(e)(6) and 332(c)(3)).

⁸ *Designation of Fort Mojave Telecommunications, Inc., et al., as Eligible Telecommunications Carriers Pursuant to Section 214(e)(6) of the Communications Act*, 13 FCC Rcd. 4547, 4553, ¶ 11 (CCB 1998) ("*Fort Mojave*"). A declaration attesting to Corr Wireless' ability and commitment to offer each of the supported services is attached hereto at Exhibit 1.

licensed service territory.⁹ Once designated as an ETC, Corr Wireless will make available a “universal service” offering that includes all of the supported services for consumers in the designated rural portion of the Company’s licensed service territory in Alabama.

1. Voice-Grade Access to the Public Switched Network. As an existing CMRS provider in Alabama, Corr Wireless currently provides, or intends to provide, voice-grade access to the public switched network throughout its licensed service territory. Through interconnection agreements with incumbent local exchange carrier (“ILECs”), Corr Wireless is able to originate and terminate telephone service for all its subscribers in its licensed service territory.
2. Local Usage. Throughout its licensed service territory, Corr Wireless currently offers, or intends to offer, several service options that include varying amounts of local usage in monthly service plans. Corr Wireless intends to offer its universal service customers in the rural portion of its licensed service territory a rate plan that includes unlimited local usage. Corr Wireless will satisfy the local usage criterion for ETC designation based upon its offering of unlimited local usage calling plans.
3. Functional Equivalent of Touch-Tone (“DTMF”) Signaling. Throughout its licensed service territory, Corr Wireless currently uses, or intends to use, out-of-band digital signaling and in-band multi-frequency (“MF”) signaling that is functionally equivalent to DTMF signaling. Corr

⁹ 47 C.F.R. § 54.101(a). Corr Wireless’ current coverage area is shown on the maps attached as Exhibit 3. Corr Wireless intends to expand its coverage area to include its entire licensed service territory as shown on the map in Exhibit 4.

Wireless therefore meets the requirement to provide DTMF signaling or its functional equivalent.¹⁰

4. Single Party Service. Corr Wireless meets the requirement of single-party service because it either currently provides, or intends to provide, a dedicated message path for the length of all customer calls throughout its licensed service territory.¹¹
5. Access to Emergency Service. Corr Wireless currently offers, or intends to offer, access to emergency service throughout its licensed service territory by dialing 911. Enhanced 911 (“E911”), which includes the capability of providing both automatic numbering information (“ANI”) and automatic location information (“ALI”), is required only if a public emergency service provider makes arrangements for the delivery of such information.¹² Corr Wireless has completed Phase I E911 implementation in all jurisdictions that have requested it. Three public emergency service providers in Corr Wireless’s authorized service territory have requested Phase II compliance. Corr Wireless currently has a Phase II waiver request pending with the FCC. The Commission has already held that wireless providers may be designated as ETCs despite the current unavailability of E911.¹³ Therefore, Corr Wireless meets the requirement to provide access to emergency service.

¹⁰ *Universal Service First Report and Order*, 12 FCC Rcd. at 8815, ¶ 71 (1997).

¹¹ *Id.* at 8810, ¶ 62.

¹² *Id.* at 8826-27, ¶ 90.

¹³ *Id.*

6. Access to Operator Services. Throughout its licensed service territory, Corr Wireless currently offers, or intends to offer, customers access to operator services.
7. Access to Interexchange Service. Throughout its licensed service territory, Corr Wireless currently provides, or intends to provide, customers with the ability to make and receive interexchange or toll calls through direct interconnection arrangements the Company has with an interexchange carrier ("IXC").
8. Access to Directory Assistance. Throughout its licensed service territory, Corr Wireless currently provides, or intends to provide, customers with access to directory assistance by dialing "411" or "555-1212."
9. Toll Limitation for Qualifying Low-Income Customers. Once designated an ETC for the requested area, Corr Wireless will participate in Lifeline as required for that area, and will offer toll blocking in satisfaction of the FCC's requirement. Throughout its licensed service territory, the Company currently provides, or intends to provide, toll blocking services for international calls and customer selected toll calls. Corr Wireless will utilize the same toll blocking technology to provide toll limitation for qualifying low-income customers, at no charge, as part of its universal service offerings in the rural portion of its licensed service territory.

C. Corr Wireless Provides the Supported Services Using its Own Facilities

Corr Wireless either provides, or intends to provide, the supported services under Section 214(e)(1)(A) of the Act and Section 54.101(a) of the Commission's rules throughout its licensed service territory using Corr Wireless's existing network infrastructure, consisting of switching,

trunking, cell sites, and network equipment, together with any expansions and enhancements to that network.

D. Corr Wireless Will Advertise its Universal Service Offering

Corr Wireless will advertise the availability of its universal service offering, and the charges therefor, using media of general distribution. Currently, Corr Wireless employs several advertising mediums to promote its service offerings, including television, radio, newspaper, and billboard advertising, as well as special targeted advertising. Corr Wireless will expand upon these media, as necessary, to insure that consumers within its designated service area are fully informed of its universal service offering. Moreover, given the fact that ETCs receive universal service support only to the extent they serve customers, and given the investments Corr Wireless plans to make to enhance its network to fully serve the universal service needs of consumers in Alabama, Corr Wireless will have strong economic incentives, reinforcing its statutory obligations, to vigorously promote its universal service offering in Alabama.

E. Designating Corr Wireless as an ETC Will Advance the Public Interest

Corr Wireless requests ETC designation for the rural portion of its licensed service territory included in the map on Exhibit 4. As noted above, Corr Wireless proposes to provide service as an ETC to the entire rural portion of its licensed service territory, and emphasizes that it is not “picking and choosing” a designated service area based upon the high or low cost of serving any particular portion of its service territory. Corr Wireless requests the specified ETC area solely on its licensed service territory, and will provide designated ETC services to all requesting customers within its designated service area, throughout its designated area.

The designation of Corr Wireless as ETC clearly is in the public interest.¹⁴ Designating Corr Wireless as an ETC fulfills several of the underlying federal policies favoring competition

¹⁴ 47 U.S.C. § 214(e)(2). Under Section 214(e)(6), the Commission stands in the place of a state commission for this purpose.

and the provision of affordable telecommunications service to consumers. Granting ETC status to Corr Wireless will promote competition in the provision of universal services to the benefit of consumers in Alabama by creating incentives to ensure that quality services are available at "just, reasonable, and affordable rates."¹⁵ In addition, designating Corr Wireless as an ETC will advance universal service by bringing consumers in Alabama new telecommunications services, including wireless local service.

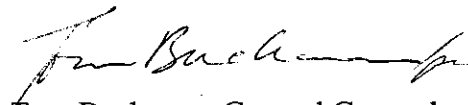
III. ANTI-DRUG ABUSE CERTIFICATION

Corr Wireless certifies that no party to this Petition is subject to a denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.¹⁶

IV. CONCLUSION

For the foregoing reasons, Corr Wireless respectfully requests ETC designation for the requested rural portion of its licensed service territory in Alabama.

Respectfully Submitted,



Tom Buchanan, General Counsel
Corr Wireless Communications, LLC
600 3rd Avenue East
Oreonta, Alabama 35121
Phone: (205) 237-3000

Date: May 13, 2003

¹⁵ 47 U.S.C. § 254 (b) (1). *See also Universal Service First Report and Order*, 12 FCC Rcd. at 8781, ¶ 4 (quoting Joint Explanatory Statement recital that goal of 1996 Act is to establish "a pro-competitive . . . framework designed to accelerate rapidly private sector deployment of advanced telecommunications and information technologies and services to **all** Americans by opening *all* telecommunications markets to competition") (emphasis added).

¹⁶ 21 U.S.C. § 862. *See attached Certification in the Declaration of Tom Buchanan at Exhibit 1.*

EXHIBITS

Exhibit 1

Declaration of Tom Buchanan

Exhibit 2

Order of the Alabama Public Service Commission

Exhibit 3

Maps of Corr Wireless Current Coverage Area

Exhibit 4

Map of Corr Wireless Requested Designated ETC Area

Exhibit 1

Declaration of Tom Buchanan

I, Tom Buchanan, do hereby declare under penalty of perjury as follows:

1. I am General Counsel of Corr Wireless Communications, L.L.C. ("Corr Wireless").


2. This Declaration is submitted in support of Corr Wireless' Petition for Designation as an Eligible Telecommunications Carrier to serve Alabama.

3. I declare and certify as follows, and as described in the aforementioned petition, that: Corr Wireless is not subject to the jurisdiction of a state commission; Corr Wireless offers, or will offer, all of the services designated by the Commission for support pursuant to Section 254(c) of the Act to any requesting customer within its designated service area, throughout its designated service area; Corr Wireless offers, or will offer, the supported services either using its own facilities or a combination of its own facilities and resale of another carrier's services; and Corr Wireless advertises, or will advertise, the availability of supported services and the charges therefor using media of general distribution as described in the Advertising Plan attached to the aforementioned Petition.

4. I declare that to the best of my knowledge, Corr Wireless, including all officers, directors, or persons holding 5% or more of the outstanding voting and/or nonvoting stock or shares of Corr Wireless, (the 5% or greater shareholders include Bryan Corr, his mother Doris S. Corr, and Doris S. Corr as trustee for the estate of her late husband R.C. Corr, Jr.), as specified in Section 1.2002(b) of the Commission's rules are not subject to a denial of federal benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.

5. I further declare that I have reviewed the aforementioned Petition and that the facts stated therein, of which I have personal knowledge, are true and correct to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.


Tom Buchanan
General Counsel

Date: May 13, 2003

Exhibit 2

Order of the Alabama Public Service Commission



STATE OF ALABAMA
ALABAMA PUBLIC SERVICE COMMISSION
P.O. BOX 991
MONTGOMERY, ALABAMA 36101-0991

JIM SULLIVAN, PRESIDENT
JAN COOK, ASSOCIATE COMMISSIONER
GEORGE C. WALLACE, JR., ASSOCIATE COMMISSIONER

WALTER L. THOMAS, JR.
SECRETARY

**PINE BELT CELLULAR, INC. and PINE
BELT PCS, INC.,**

Joint Petitioners

**PETITION: For ETC status and/or
clarification regarding the jurisdiction
of the Commission to grant ETC status
to wireless carriers.**

DOCKET U-4400

ORDER

BY THE COMMISSION:

In a joint pleading submitted on September 11, 2001, Pine Belt Cellular, Inc. and Pine Belt PCS, Inc. (collectively referred to as "Pine Belt") each notified the Commission of their desire to be designated as universal service eligible telecommunications carriers ("ETCs") for purposes of providing wireless ETC service in certain of the non-rural Alabama wireline service territories of BellSouth Telecommunications, Inc. ("BellSouth") and Verizon South, Inc. ("Verizon"). The Pine Belt companies noted their affiliation with Pine Belt Telephone Company, a provider of wireline telephone service in rural Alabama, but clarified that they exclusively provide cellular telecommunications and personal communications (collectively referred to as "CMRS" or "wireless") services in their respective service areas in Alabama in accordance with licenses granted by the Federal Communications Commission ("FCC"). The pivotal issue raised in the joint pleading of Pine Belt companies is whether the Commission will assert jurisdiction in this matter given the wireless status of the Pine Belt companies.

As noted in the filing of the Pine Belt companies, state Commissions have primary responsibility for the designation of eligible telecommunications carriers in their respective jurisdictions for universal service purposes pursuant to 47 USC §214(e). The Commission indeed established guidelines and requirements for attaining ETC status in this jurisdiction pursuant to notice issued on October 31, 1997.

DOCKET U-4400 - #2

For carriers not subject to state jurisdiction, however, §214(e)(6) of the Telecommunications Act of 1996 provides that the FCC shall, upon request, designate such carriers as ETCs in non-rural service territories if said carriers meet the requirements of §214(e)(1). In an FCC Public Notice released December 29, 1997 (FCC 97-419) entitled "Procedures for FCC designation of Eligible Telecommunications Carriers pursuant to §214(e)(6) of the Telecommunications Act", the FCC required each applicant seeking ETC designation from the FCC to provide, among other things, "a certification and brief statement of supporting facts demonstrating that the Petitioner is not subject to the jurisdiction of a state Commission."

The Pine Belt companies enclosed with their joint pleading completed ETC application forms as developed by the Commission. In the event the Commission determines that it does not have jurisdiction to act on the Pine Belt request for ETC status, however, the Pine Belt companies seek an affirmative written statement from the Commission indicating that the Commission lacks jurisdiction to grant them ETC status as wireless carriers.

The issue concerning the APSC's jurisdiction over providers of cellular services, broadband personal communications services, and commercial mobile radio services is one that was rather recently addressed by the Commission. The Commission indeed issued a Declaratory Ruling on March 2, 2000, in Docket 26414 which concluded that as the result of certain amendments to the Code of Alabama, 1975 §40-21-120(2) and (1)(a) effectuated in June of 1999, the APSC has no authority to regulate, in any respect, cellular services, broadband personal communications services and commercial mobile radio services in Alabama. Given the aforementioned conclusions by the Commission, it seems rather clear that the Commission has no jurisdiction to take action on the Application of the Pine Belt companies for ETC status in this jurisdiction. The Pine Belt companies and all other wireless providers seeking ETC status should pursue their ETC designation request with the FCC as provided by 47 USC §214(e)(6).

DOCKET U-4400 - #3

IT IS, THEREFORE, ORDERED BY THE COMMISSION, That the Commission's jurisdiction to grant Eligible Telecommunications Carrier status for universal service purposes does not extend to providers of cellular services, broadband personal communications services, and commercial mobile radio services. Providers of such services seeking Eligible Telecommunications Carrier status should accordingly pursue their requests through the Federal Communications Commission.

IT IS FURTHER ORDERED, That this Order shall be effective as of the date hereof.

DONE at Montgomery, Alabama, this 12th day of March, 2002.

ALABAMA PUBLIC SERVICE COMMISSION


Jim Sullivan, President


Jan Cook, Commissioner


George C. Wallace, Jr., Commissioner

ATTEST: A True Copy

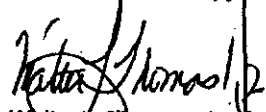
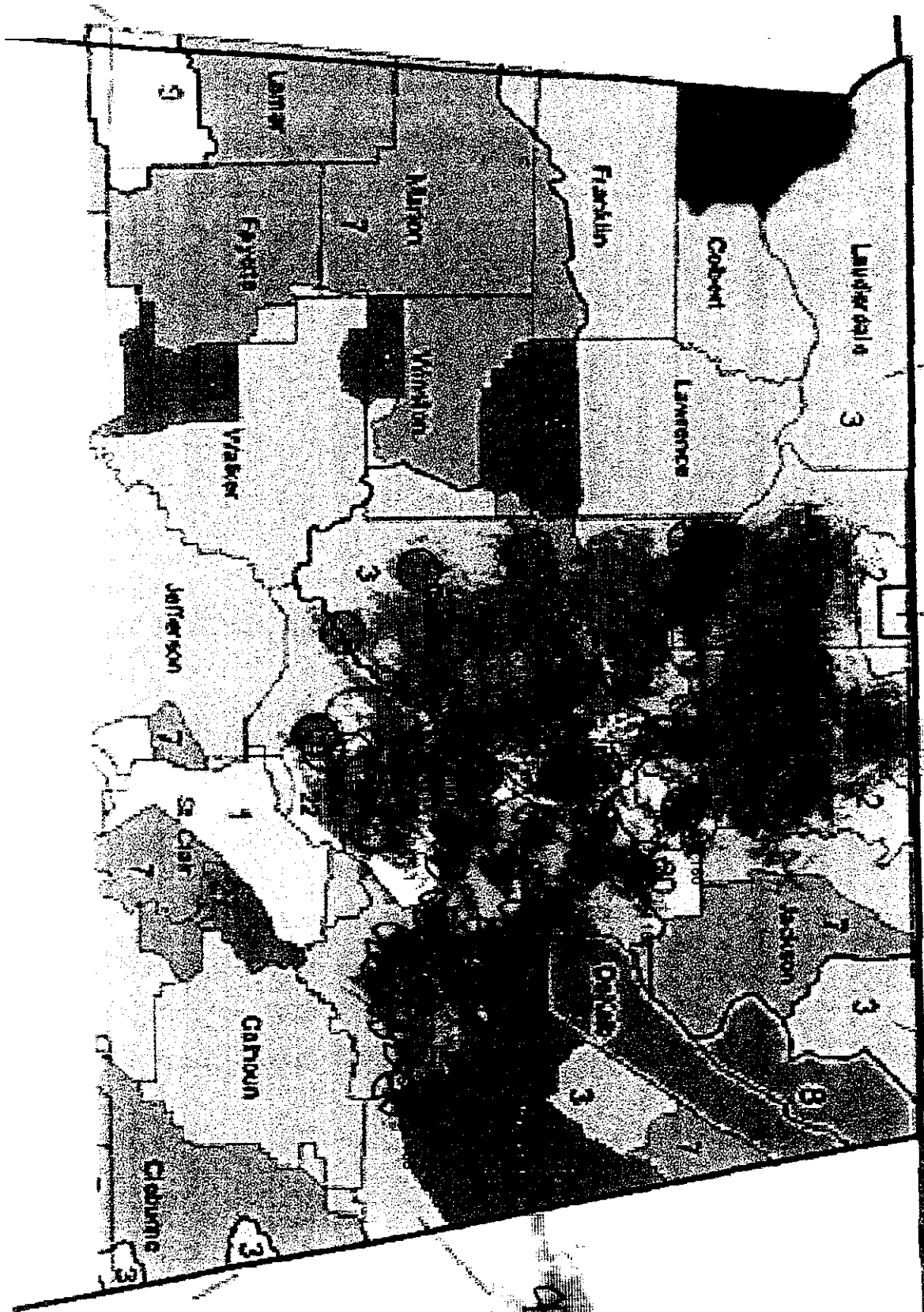
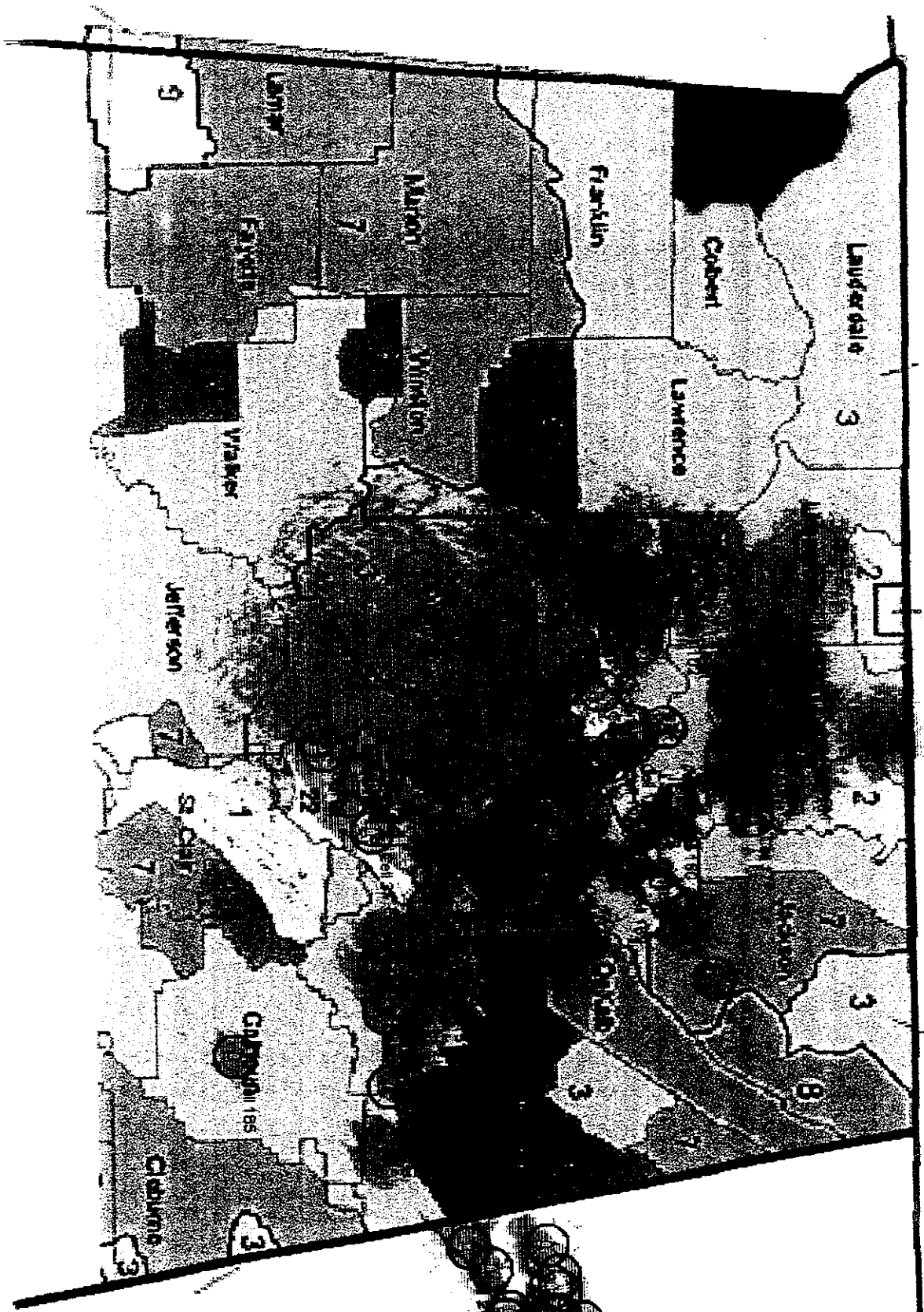

Walter L. Thomas, Jr., Secretary

Exhibit 3

Maps of Corr Wireless Coverage Area





Cell 215
(S. 215)
212

Exhibit 4

Map of Corr Wireless Requested Designated ETC Area

Corr Wireless Communications, LLC's ("Corr Wireless" or "Company") entire licensed service territory in Alabama is shown on the attached map (outlined in red). Corr Wireless requests ETC authority for the rural portion of its licensed service territory served by the following rural wireline carriers (reference number for carrier on map included in parenthesis below):¹⁷

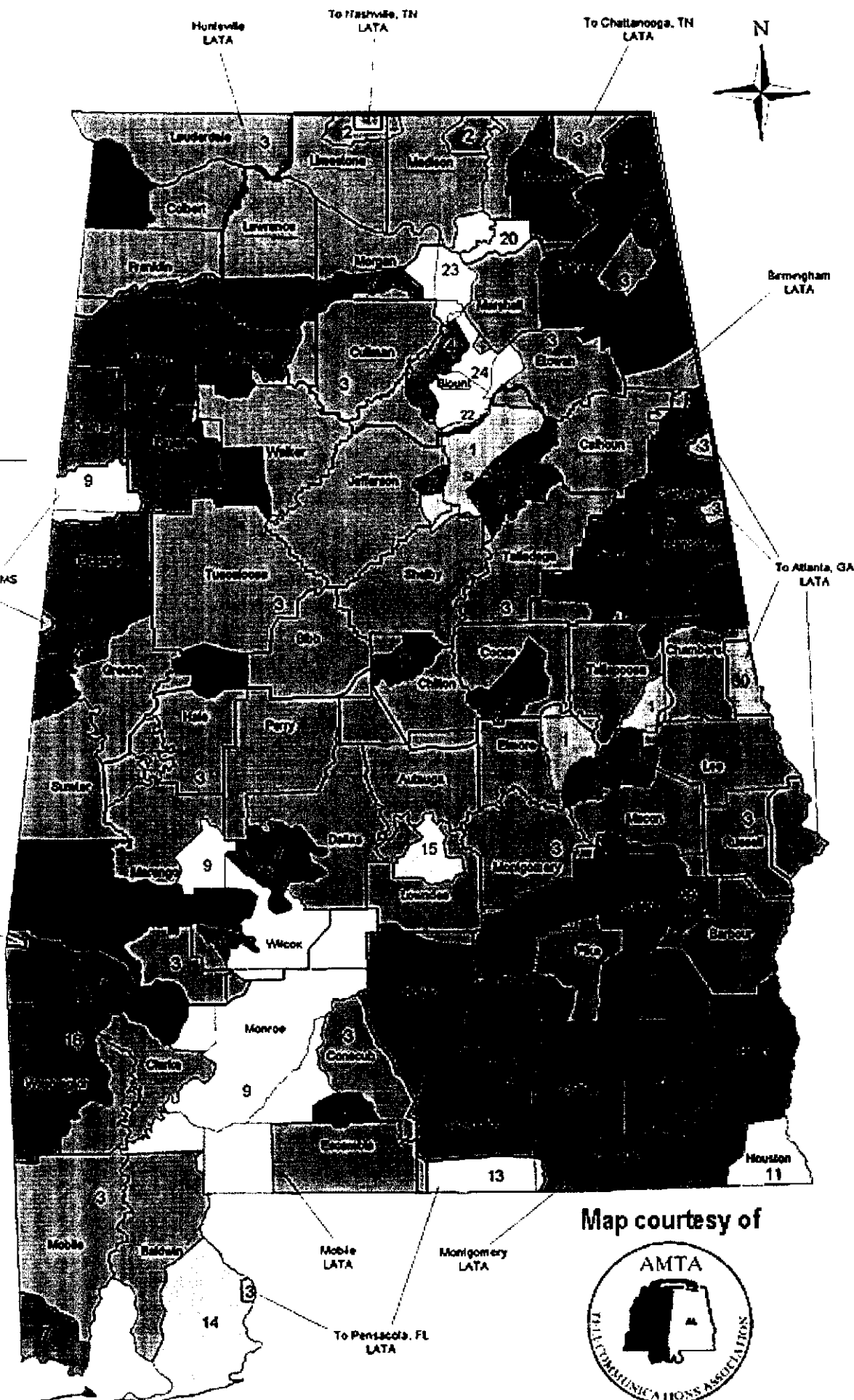
Ardmore Telephone Company (2)
Blountsville Telephone Company (4)
Butler Telephone Company (21)
Farmers Telephone Co-op (8)
CenturyTel (7)
New Hope Telephone Company (20)
OTELCO (22)
OTELCO-Brindlee Mountain Division (23)
OTELCO-Hopper Division (24)
Peoples Telephone Company (25)

¹⁷ Please note that Corr Wireless is not seeking to include in its designated area any rural wireline study areas that are not entirely encompassed in the Company's licensed service territory. Excluded are the study areas of rural wireline carriers Alltel Alabama (1), Oakman Telephone Co. (21) and Roanoke Telephone Co. (28). Also excluded are two study areas of CenturyTel (7), one of which is adjacent to the study area of Oakman Telephone Co. (21) in the northern portion of the Company's licensed service territory, and the other of which is adjacent to the study area of Roanoke Telephone Co. (28) in the southern portion of the Company's licensed service territory.

CERTIFIED TELEPHONE AREAS IN ALABAMA 2002

INCUMBENT LOCAL EXCHANGE PROVIDERS:

1. Altel Alabama, Inc.
2. Ardmore Telephone Co.
3. BellSouth Telecommunications
4. Blountville Telephone Co.
5. Butler Telephone Co. (TDS)
6. Castleberry Telephone Co.
7. CenturyTel
8. Farmers Telephone Co-op
9. Frontier Comm., Inc.
10. Goshen Telephone Co. (TDS)
11. Graceba Total Comm.
12. Grove Hill Tel. Corp. (TDS)
13. GT Com
14. Gulf Telephone Co.
15. Hayneville Telephone Co.
16. Milby Telephone Co.
17. Mon-Cre Telephone Co-op
18. Moundville Telephone Co.
19. National Tel. of Alabama (TEC)
20. New Hope Telephone Co-op
21. Oakman Telephone Co. (TDS)
22. OTELCO
23. OTELCO-Brindlee Mountain Div.
24. OTELCO-Hopper Div.
25. Peoples Telephone Co. (TDS)
26. Pine Bell Telephone Co.
27. Ragland Telephone Co.
28. Roanoke Telephone Co. (TEC)
29. Union Springs Telephone Co.
30. Valley Telephone Co.



Map courtesy of



CERTIFICATE OF SERVICE

I, Tom Buchanan, hereby certify that on this 13th day of May 2003, copies of the foregoing Petition for Designation as an Eligible Telecommunications Carrier were hand delivered to those parties marked with an asterisk. All others were served by First Class mail.


Marlene H. Dortch, Secretary*
Federal Communications Commission
Office of the Secretary
c/o Vistronix, Inc.
236 Massachusetts Avenue, N.E.
Suite 110
Washington, DC 20002

Sheryl Todd*
Federal Communications Commission
c/o Vistronix, Inc.
236 Massachusetts Avenue, N.E.
Suite 110
Washington, DC 20002

Anita Cheng*
Federal Communications Commission
c/o Vistronix, Inc.
236 Massachusetts Avenue, N.E.
Suite 110
Washington, DC 20002

Walter L. Thomas, Jr., Secretary
Alabama Public Service Commission
RSA Building
100 North Union Street, Suite 850
Montgomery, Alabama 36101

Administrative Law Judge John Garner
Alabama Public Service Commission
RSA Building
100 North Union Street, Suite 850
Montgomery, Alabama 36101


Tom Buchanan